

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

MARK FLORA	§	
	§	
<i>Plaintiff,</i>	§	
	§	
VS.	§	CIVIL ACTION NO.:
	§	4:19-CV-2328
TRANSOCEAN DRILLING (USA),	§	
INC., ET AL.	§	
<i>Defendants.</i>	§	

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**JOINT MOTION FOR AN AMENDED RULE 16 SCHEDULING ORDER**

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Plaintiff, Mark Flora, and Defendants, Grand Isle Shipyard, LLC, Gulf Logistics Operating, Inc.; Gulf Logistics, LLC, and LLOG Exploration Offshore, LLC (erroneously named as LLOG Holdings, LLC); file this Joint Motion for an Amended Rule 16 Scheduling Order and would respectfully show as follows:

On July 2, 2020, this Court entered the Amended Rule 16 Scheduling Order. *See* ECF No. 36. On October 30, 2020, the Court entered a subsequent Amended Rule 16 Scheduling Order. *See* ECF No. 42.

Unfortunately, continued delays flowing from the pandemic, multiple Gulf Coast storms, and a winter storm have delayed completion of remaining but necessary discovery, including depositions of Defendants' corporate

representatives, Plaintiff's treating medical providers (who are located in Texas and Louisiana), other key witnesses and Plaintiff and Defendants' retained experts. Trial is currently set for the August 2021 trial term and the parties assert that additional time to conduct discovery is needed to prepare the case for trial. *Id.* The parties are not seeking a continuance of the existing trial date, but respectfully request the following new deadlines so that the remaining discovery can be conducted before the current discovery deadline with a reasonable amount of time thereafter to timely file appropriate motions.

The Parties have agreed to mediate this matter with Mr. Robins Brice. Due to scheduling conflicts, the parties were unable to mediate with Mr. Brice in December 2020 as previously expected. The Parties are working together to schedule mediation with Mr. Brice.

This is the fourth Amended Docket Control Order requested by the Parties, who have met and conferred and propose the following deadlines:

- **June 1, 2021:** DISCOVERY shall be completed by this date.
- **June 30, 2021:** MOTION CUT-OFF: No motion, including motions to exclude or limit expert testimony under Fed. R. Evid. 702, shall be filed after this date except for good cause shown. See LR 7.

**Prayer**

The Parties ask this Court to enter an amended Rule 16 Scheduling Order, and to grant any further relief, either in equity or at law, to which they are justly entitled to receive.

Respectfully submitted,

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*LLOG Exploration Offshore, LLC*

*(erroneously named as LLOG Holdings, LLC)*

### **Certificate of Service**

I hereby certify that on March 29, 2021 2020, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF filing system. Notice of this filing will be sent to counsel for all parties by operation of the Court's electronic filing system.

/s/Daniel E. Sheppard  
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